



Sheppard, Mullin, Richter & Hampton LLP
30 Rockefeller Plaza
New York, New York 10112-0015
212.653.8700 main
212.653.8701 fax
www.sheppardmullin.com

212.634.3059 direct
bmurphy@sheppardmullin.com

March 19, 2021

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Castaneda v. Marriott International, Inc., et al.*, No. 19-CV-00725-RA-GWG

Dear Judge Abrams:

We represent Defendant Marriott International, Inc. ("Defendant") in the above-referenced matter. We write together with Counsel to Plaintiff Iris Castaneda ("Plaintiff") to request an extension of time to submit a status report from today to a date after April 9, 2021 and to request that the March 26, 2021 conference scheduled for 1:30 PM be adjourned. This is the Parties' first request for an extension of this deadline.

Discovery was scheduled to conclude on March 17, 2021, which remained open to that date for purposes of taking Plaintiff's deposition. The Parties convened the deposition on March 17 over Zoom and completed approximately six hours of testimony. However, the inefficiencies created by Zoom and the volume of Plaintiff's allegations and claims, made it apparent to both sides that the deposition would not be completed within seven hours. Rather than petition the Court for an extension of time to complete the deposition under Rule 30, the Parties jointly agreed to adjourn the deposition just after 6:00 PM. The Parties have agreed in principal to the parameters for the continued deposition, and will reduce their agreement to stipulation in short-order.

The Parties advised Magistrate Gorenstein of this development and requested an extension to complete the deposition until April 9, 2021. The Court granted this request. See Docket No. 75. Accordingly, the Parties believe it appropriate to adjourn the date to submit a status report to Your Honor and to participate in a status conference to dates selected by the Court after April 9, 2021.

We thank the Court for its consideration of this request.

Application granted. The conference scheduled for March 26, 2021 is hereby adjourned to April 23, 2021 at 12:45 p.m. The joint letter shall be due April 16, 2021.

SO ORDERED.

A handwritten signature in black ink, appearing to be "RA", written over a horizontal line.

Hon. Ronnie Abrams
03/22/2021

Respectfully submitted,

/s/ Brian D. Murphy

Brian D. Murphy
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP